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Chapter 9 Counsel for Tulare Local Healthcare District, Debtor

IN THE UNITED STATES BANKRUPTCY COURT**EASTERN DISTRICT OF CALIFORNIA****FRESNO DIVISION**

In re

CASE NO. 17-13797

TULARE LOCAL HEALTHCARE
DISTRICT,

Chapter 9

Debtor.

DC No.: WJH-19

Tax ID #: 94-6002897

Date: February 26, 2020

Address: 869 N. Cherry Street
Tulare, CA 93274

Time: 1:30 p.m.

Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13

Judge: Honorable René Lastreto II

**DEBTOR'S OBJECTION TO PROOF OF CLAIM
NUMBER 232 FILED BY GUPTA-KUMAR MEDICAL PRACTICE****TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE AND OTHER
PARTIES IN INTEREST:**

Pursuant to 11 U.S.C. § 502 and FRBP 3007, Tulare Local Healthcare District dba Tulare Regional Medical Center (the "Debtor") objects to Proof of Claim Number 232 (the "Claim") filed by Gupta-Kumar Medical Practice ("Gupta"). This objection is based on the following:

1. The Debtor commenced a voluntary bankruptcy petition under Chapter 9 of the Bankruptcy Code on September 30, 2017 (the "Petition Date"), in the Eastern District of California.

2. The claims bar date was set as April 10, 2018.

1 3. On April 10, 2018, Gupta filed Proof of Claim 232 in the total amount of
2 \$285,136 on account of medical healthcare services. A copy of Proof of Claim Number 232 is
3 attached as Exhibit A.

4 4. The Debtor objects to Gupta's Claim on the basis that such Claim is inconsistent
5 with the Debtor's books and records and that the Debtor has no liability for the amount and
6 Claim asserted. Additionally, the Claim appears to duplicate the amount claimed in Claim
7 number 231 filed by a related entity on the same day. The Debtor objects to the Gupta Claim in
8 its entirety.


9 5. The Debtor submits that additional grounds may exist for the Debtor to object to
10 the Claim, other than the grounds asserted in this Objection. The Debtor has not attempted to
11 raise in this Objection each such ground, but reserves the right to do so at a later time and to the
12 extent the Claim is not disallowed as may be requested in this Objection. The Debtor also
13 reserves each defense, counterclaim, or setoff that may apply to the Claim. If a response to this
14 Objection is received, the Debtor reserves the right to amend and supplement this Objection, or
15 file additional objections to assert any defenses, counterclaims, and/or setoffs against the Claim.
16 In all instances, the Debtor reserves the right to file future objections or motions to supplement
17 this Objection as to the validity, amount, or status of the Claim upon different grounds than set
18 forth herein or otherwise.

19 WHEREFORE, the Debtor respectfully requests that this Objection be sustained and the
20 Proof of Claim Number 232 filed by Claimant be disallowed in its entirety and seeks such other
21 and further relief as is just and proper.

22 Dated: January 7, 2020

WANGER JONES HELSLEY

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24 By:


Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District